1 THE HONORABLE MICHELLE L. PETERSON 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 BRYAN ESMOND, RONALD MORAN, and Case No. 3:23-cv-05664-MLP JOSEPH NETTLES, 10 STIPULATED MOTION TO EXTEND Plaintiffs, 11 ALL DEADLINES 12 v. NOTE ON MOTION CALENDAR: November 13, 2023 13 BRIDGEVIEW FINANCE LLC, and SARAH REARDON, 14 Defendants. 15 16 **STIPULATION** 17 18 Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs, Bryan Esmond, Ronald Moran, and Joseph Nettles, and Defendants, Bridgeview Finance, LLC and Sarah Reardon (together "the 19 Parties"), STIPULATE AND AGREE to extend all deadlines, including the deadline for 20 Defendants to move, answer, or otherwise respond to the Complaint, to November 20, 2023. 21 The stipulation is based on the following: 22 WHEREAS, Plaintiffs filed their Complaint in this action on July 24, 2023; 23 24 WHEREAS, since the Complaint was filed Counsel for the Parties have engaged in significant discussions regarding resolving this matter and the Parties remain hopeful that a 25 resolution will be reached soon. The Parties believe an additional brief extension of time will 26 STIPULATED MOTION TO EXTEND ALL MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW DEADLINES - 1 1301 SECOND AVENUE, SUITE 2800

> SEATTLE, WASHINGTON 98101 TEL +1.206.274.6400 FAX +1.206.274.6401

(Case No. 3:23-cv-05664-MLP)

further assist good faith discussions and determine whether a resolution can be reached and, if so, to agree on the principal terms of such a resolution;

WHEREAS, the previous Stipulated Motion to Extend All Deadlines (Dkt. No. 18) extended all of the dates in the Court's Initial Scheduling Order (Dkt. No. 12) to November 27, 2023 and the deadline for Defendants to move, answer, or otherwise respond to Plaintiff's Complaint to November 13, 2023;

WHEREAS, in order to provide the Parties with additional time to attempt to resolve this matter without the unnecessary time and costs associated with a response to Plaintiffs' Complaint, the Parties stipulate and agree that the deadline for Defendants to move, answer, or otherwise respond to Plaintiff's Complaint will be November 20, 2023;

WHEREAS, the granting of this Motion will not prejudice any party, as Plaintiffs have agreed to this extension, and this extension is being sought in good faith and not for delay or any other improper purpose.

NOW THEREFORE, the Parties stipulate to the following:

- 1. To extend the deadline for Defendants to move, answer, or otherwise respond to the Complaint to **November 20, 2023**.
- 2. The Parties agree to complete their deadlines for an FRCP 26(f) Conference, Inidital Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1), and Combined Joint Status Report and Discovery Plan as Required by Fed. R. Civ. P. 26(f) and Local Civil Rule 26(f) by **December 4**, 2023.
- 3. This Stipulation and Order shall not operate as an admissison of any factual allegation or legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim or objection.

STIPULATED AND AGREED TO this 13th day of November, 2023.

STIPULATED MOTION TO EXTEND ALL

1	LAWHQ, PC	MORGAN, LEWIS & BOCKIUS LLP
2	By: <u>s/ Conner Spani</u>	By: s/ Austin Popham
3	Conner Spani, WSBA #58788	Austin Popham, WSBA #59193
4	299 S. Main Street, Suite #1300	1301 Second Avenue, Suite 2800
	Salt Lake City, UT 84111 Phone: (385) 285-1090	Seattle, WA 98101 Phone: (206) 274-6400
5	Email: conner.spani@lawhq.com	Email: austin.popham@morganlewis.com
6	Augustus Com Planing Com	Driver C. Francisco (Des Hars Visco)
7	Attorney for Plaintiffs	Brian C. Frontino (<i>Pro Hac Vice to be submitted</i>)
O		600 Brickell Avenue, Suite #1600
8		Miami, FL 33131-3075
9		Phone: (305) 415-3313 Email: brian.frontino@morganlewis.com
10		Email: oriali: Hontino@morganiewis.com
11		Attorneys for Defendants
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		

STIPULATED MOTION TO EXTEND ALL DEADLINES - 3 (Case No. 3:23-cv-05664-MLP)

1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101
TEL +1.206.274.6400 FAX +1.206.274.6401

1 **ORDER** 2 IT IS SO ORDERED. 3 4 DATED: November 14, 2023. 5 Mypelison 6 MICHELLE L. PETERSON 7 United States Magistrate Judge 8 9 Presented by: 10 MORGAN, LEWIS & BOCKIUS LLP 11 By: s/ Austin Popham Austin Popham, WSBA #59193 12 1301 Second Avenue, Suite 2800 Seattle, WA 98101 13 Phone: (206) 274-6400 14 Email: austin.popham@morganlewis.com 15 Brian C. Frontino (Pro Hac Vice to be submitted) 600 Brickell Avenue, Suite #1600 16 Miami, FL 33131-3075 Phone: (305) 415-3313 17 Email: brian.frontino@morganlewis.com 18 Attorneys for Defendants 19 LAWHQ, PC 20 21 By: s/ Conner Spani Conner Spani, WSBA #58788 22 299 S. Main Street, Suite #1300 Salt Lake City, UT 84111 23 Phone: (385) 285-1090 24 Email: conner.spani@lawhq.com 25 Attorney for Plaintiffs 26 STIPULATED MOTION TO EXTEND ALL MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW **DEADLINES - 4** 1301 SECOND AVENUE, SUITE 2800

> SEATTLE, WASHINGTON 98101 TEL +1.206.274.6400 FAX +1.206.274.6401

(Case No. 3:23-cv-05664-MLP)